



EIS Scoping Comment on Patterns of Wind-Blown Smoke vs. Wind-Blown Coal Dust Emissions

My name is Michael Crum. When BP Cherry Point Refinery emergency warning sirens sounded, February 17, 2012, my wife and I were walking in our Birch Bay Village neighborhood. We headed toward home, immediately. But, in less than 15 minutes, an ominous smoke cloud (shown at left) had moved across the waters of Birch Bay, blanketed all of Birch Bay Village and continued to drift northward. It was a startling reminder of just how fast toxic emissions from the Cherry Point area can impact nearby neighborhoods, bays and beaches.

Wind-blown coal dust at Westshore Terminal near Tsawassen, B.C. was captured in the image below on April 12, 2012. As reported in *The Delta Optimist*, Westshore general manager, Denis Hogan, attributed the coal dust cloud to "... an unexpected gust of wind." A 2001 Canadian study of coal dust emissions estimated that the Westshore Terminal emits roughly 1.5 million pounds of coal dust each year. The proposed Gateway Pacific Terminal (GPT) at Cherry Point would be more than double the size of Westshore with a reasonably foreseeable three (3) million pounds of coal dust emissions annually. Coal dust contains toxic substances such as lead, mercury, arsenic, benzene and formaldehyde. These substances can cause serious health problems including: cancer, heart attack, asthma and birth defects. There is no safe level of exposure to these substances, according to an extensive research review conducted by more than 200 Whatcom County physicians.

With the proposed GPT site located immediately to the south and adjacent to the BP Cherry Point Refinery, both facilities would share virtually identical wind velocity and direction patterns. Having personally witnessed the rapid movement of wind-blown smoke from the BP Cherry Point Refinery fire in February 2012 and having visited the waterfront home in Tsawassen, B.C. where the photo of massive wind-blown coal dust clouds rising from Westshore Terminal in April 2012 was taken, I am concerned that the proposed GPT "East Loop" (2.75 million metric tons of uncovered coal stockpiles) poses reasonably foreseeable, significant and adverse impacts from wind-blown coal dust on nearby neighborhoods, bays and beaches as well as on the Cherry Point Aquatic Reserve. Therefore, I ask:



- That the EIS include a comprehensive, comparative analysis of the particulate characteristics of smoke vs. fugitive coal dust and the potential for wind-blown toxic particulates from the GPT's open and uncovered, 60 ft. high, two and a half mile long coal stockpiles to spread beyond the GPT industrial site.
- Please study whether wind-blown coal dust from the proposed GPT site could increase safety hazards at BP Cherry Point Refinery due to accumulating fugitive coal dust on mechanical and/or electrical sensors, gauges, switches, valves, connectors, etc. on the refinery's towering structures.
- Please study whether wind-blown coal dust from the proposed GPT site could adversely impact nearby neighborhoods, bays and beaches of Birch Bay as well as surface waters of the Cherry Point Aquatic Reserve.
- Determine whether any identified direct or indirect, significant and adverse impacts, related to any of the above, would be cumulative.